



FUEL OIL NON AVAILABILTY REPORT

Submitted to the Environmental Protection Agency on February 20th, 2015

On behalf of AET Inc, we would like to notify the US Coast Guard and Environmental Protection Agency that our vessel the Paramount Halifax (IMO # 9453987 – Isle of Man flagged) will be operating in the North America ECA zone starting February 20th, 2015 with non compliant IFO 380 onboard.

The vessel is currently in the Philadelphia area at anchorage and is not expected to go to berth until the middle of March currently. The vessel is fully laden with cargo and as a result, we are unable to go to the nearby Marcus Hook anchorage or Delaware City anchorage due to draft restrictions.

Originally the vessel arrived from Canada from Whiffen Head where there is not any fuel supply available. We had planned on discharging cargo in Philadelphia and then taking on more compliant MGO diesel fuel (max 0.10%). We would have still had MGO onboard and could have discharged cargo and refuelled without having to use non compliant fuel. Upon arrival on Jan 25th, the vessel still had 431 mt of Marine gas oil onboard (see attached emails and reports)

However, the vessel arrived at the current location on Jan 25th, 2015 and has been sitting at anchorage for almost a month now. This delay was unforeseen and due to charterers changes in itinerary and the need to keep the cargo heated, we are running out of MGO onboard and currently have less than 85 mt onboard. We need to keep some MGO onboard for safety considerations as per our internal guidelines for fuel requirements in case of engine restart or needing to flush fuel lines.

As a result, we will be utilizing IFO 380 (RMG grade – 2.17% sulphur) for the duration of our stay at

I am attaching a copy of the vessel's last bunkering which shows the sulphur levels of the non compliant fuel, emails showing the chain of events as well as the additional paperwork required by the EPA.

I certify under penalty of law that the statements and information made herein are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines and imprisonment pursuant to 18 USC 1001.

Best regards,

Robert Love / AET Inc Limited

Bunker Manager - Global Bunker Procurement

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